

Subject: FR Notice Comments - 76 FR 50220 - Recommendations on Using Fewer  
Animals to Identify Chemical Eye Hazards  
Date: Monday, September 26, 2011 1:14 PM

Below is the result of your feedback form. It was submitted by  
( ) on Monday, September 26, 2011 at 13:14:12

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Comment\_date: September 26, 2011

Prefix: Dr.

FirstName: Bobbie Ann

LastName: Austin

Degree: PhD

onBehalfOf: yes

Title: Assistant Director

Department: Executive

Company: Association for Research in Vision & Ophthalmology (ARVO)

Country: United States

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Comments: Submitted on behalf of Brian Gilger, DVM, MS, ARVO's  
Animals-in-Research committee chair

Dear Dr. Stokes:

Thank you for welcoming comments from ARVO about the  
proposed reduction in the number of animals to identify  
chemical eye hazards and also for answering our questions  
via e-mail about the manuscript referenced in the federal  
register.

ARVO's Animals-in-Research committee reviewed the Federal  
Register notice (Vol . 76, No. 156, August 12, 2011) about  
the request for feedback on draft ICCVAM recommendations to

use fewer animals to identify chemical eye hazards. They also reviewed the referenced publish ahead of print article [Regulatory Toxicology and Pharmacology 61 (2011) 98–104], which discusses the Scientific Advisory Committee on Alternative Toxicological Methods meeting, held on June 17–18, 2010.

ARVO's Animals-in-Research committee supports the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) recommendation that in vivo ocular safety testing adhere to the 3-animal procedure, as described in the test guidelines issued by the Organisation for Economic Co-operation and Development (OECD Test Guideline 405) and by the U.S. Environmental Protection Agency (OPPTS 870.2400). The committee thinks the proposed regulatory change is good for harmonizing guidelines across government agencies and is in the spirit of the 3R's concept for humane research animal use (reduction, refinement and replacement). They also thought the statistical argument made in the referenced manuscript, from the Scientific Advisory Committee on Alternative Toxicological Methods meeting, seemed reasonable.

ARVO is the largest and most respected vision research organization in the world. Members include more than 12,763 researchers from over 80 countries. The membership is multidisciplinary and consists of both clinical and basic scientists who contribute to the quality of life by increasing knowledge about sight. The Association encourages and assists members in research, training, publication and dissemination of knowledge in vision and ophthalmology, and in the ethical and humane use of animals in vision research. Continued progress in many areas of vision inquiry requires research with animals to investigate complex systems and functions. For more information, visit: [www.arvo.org/animals](http://www.arvo.org/animals).

Thank you for your time.

Sincerely,

Bobbie Ann Austin

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